UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO

EASTERN DIVISION

In re FIRSTENERGY CORP. SECURITIES LITIGATION) No. 2:20-cv-03785-ALM-KAJ
) <u>CLASS ACTION</u>
This Document Relates To:	Judge Algenon L. MarbleyMagistrate Judge Kimberly A. Jolson
ALL ACTIONS.)
	_)

PLAINTIFFS' MOTION TO COMPEL NON-PARTY INDUSTRIAL ENERGY USERS-OHIO TO PRODUCE DOCUMENTS

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Liaison Counsel Class Counsel

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Class Representatives Los Angeles County Employees

Retirement Association, Amalgamated Bank, as Trustee for the LongView LargeCap 500 Index

Fund, LongView Quantitative LargeCap Fund, LongView Broad Market 3000 Index Fund,

LongView LargeCap 500 Index Fund VEBA, LV LargeCap 1000 Value Index Fund, LongView

Quantitative MidCap Fund, LongView Quant LargeCap Equity VEBA Fund and LongView Core

Plus Fixed Income Fund, City of Irving Supplemental Benefit Plan, and Wisconsin Laborers'

Pension Fund (collectively, the "Plaintiffs"), hereby move this Court for an order compelling non-

party Industrial Energy Users-Ohio ("IEU-Ohio") to produce documents. This motion is made

following Plaintiffs' good faith conferral with non-party IEU-Ohio pursuant to Federal Rules of

Civil Procedure 26 and 37 and the Southern District of Ohio Local Civil Rule 37.1.

This motion is based upon the accompanying memorandum of law in support thereof, the

declaration of Rachel A. Cocalis, and such other evidence and argument as the Court may consider.

DATED: November 15, 2024

MURRAY MURPHY MOUL + BASIL LLP JOSEPH F. MURRAY, Trial Attorney (0063373)

s/ Joseph F. Murray

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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2024, I electronically filed the foregoing with the Clerk of the Court by using the e-Filing system, which will send a notice of electronic filing to all counsel of record in this case.

Joseph F. Murray

Joseph F. Murray